

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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IN RE LOWER MANHATTAN DISASTER SITE
LITIGATION
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WALTER GALLEGOS,

07CV4467

Plaintiffs,

ANSWER TO
AMENDED
COMPLAINT

-against-

120 BROADWAY CONDOMINIUM (CONDO #871), 120 BROADWAY HOLDING, LLC, 120 BROADWAY PROPERTIES, LLC, 120 BROADWAY, LLC, 715 REALTY CORP., ALAN KASMAN D/B/A KASCO, ANN TAYLOR STORES CORPORATION, BATTERY PARK CITY AUTHORITY, BLACKMON-MOORJNG STEAMATIC CATASTOPHE, INC. D/B/A BMS CAT, BOARD OF EDUCATION OF THE CITY OF NEW YORK, BOARD OF MANAGERS OF THE 120 BROADWAY CONDOMINIUM (CONDO #871), BOARD OF MANAGERS OF THE HUDSON VIEW EAST CONDOMINIUM, BROOKFIELD FINANCIAL PROPERTIES, INC., BROOKFIELD FINANCIAL PROPERTIES, LP, BROOKFIELD PARTNERS, LP, BROOKFIELD PROPERTIES CORPORATION, BROOKFIELD PROPERTIES HOLDINGS INC., CITIBANK, NA, DEPARTMENT OF BUSINESS SERVICES, ENVIROTECH CLEAN AIR., INC., GPS ENVIRONMENTAL CONSULTANTS, INC., GRUBB & ELLIS MANAGEMENT SERVICES, HILLMAN ENVIRONMENTAL GROUP, LLC., HUDSON VIEW EAST CONDOMNIUM, HUDSON VIEW TOWERS ASSOCIATES, INDOOR ENVIRONMENTAL TECHNOLOGY, INC., KASCO RESTORATION SERVICES CO., LIBERTY VIEW ASSOCIATES, L.P., MAZAL GROUP (THE MONIAN GROUP), MERRILL

LYNCH& CO, INC., MOODY'S HOLDINGS,
INC., NEW YORK CITY SCHOOL
CONSTRUCTION AUTHORITY, NEW YORK
UNIVERSITY, NEWARK KNIGHT FRANK,
NOMURA HOLDING AMERICA, INC.,
NOMURA SECURITIES INTERNATIONAL,
INC., R Y MANAGEMENT CO., INC., RELATED
BPC ASSOCIATES, INC., RELATED
MANAGEMENT CO., LP, ROCKROSE
DEVELOPMENT CORP., RY MANAGEMENT,
SABINE ZERARKA, SILVERSTEIN
PROPERTIES, INC., SOUTHBRIDGE TOWERS,
INC., STRUCTURE TONE (UK), INC.,
STRUCTURE TONE GLOBAL SERVICES, INC.,
THAMES REALTY CO, THE RELATED
COMPANIES, LP, THE RELATED REALTY
GROUP, INC., TOSCORP INC., TRIBECA
LANDING L.L.C., VERIZON NEW YORK, INC,
WESTON SOLUTIONS, INC., WFP TOWER B
CO. G.P, CORP., WFP TOWER B HOLDING CO.,
LP, WFP TOWER B. CO., L.P., WFP TOWER D
CO. G.P. CORP., WFP TOWER D HOLDING CO.
I L.P., WFP TOWER D HOLDING CO. II L.P.,
WFP TOWER D HOLDING I G.P. CORP., AND
WFP TOWER D. CO., LP., ET AL

Defendants.

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PLEASE TAKE NOTICE that defendant Envirotech Clean Air Inc. ("Envirotech"), as and for their responses to the allegations set forth in the Complaint by Adoption ("Check-off Complaint") related to the Master Complaint filed in the above-referenced action, hereby adopts Envirotech's Answer to the Master Complaint dated August 3, 2007, which was filed in the matter of *In re World Trade Center Lower Manhattan Disaster Site Litigation*, 21 MC 102 (AKH).

WHEREFORE, the defendant Envirotech demands judgment dismissing the above-captioned action as against each of them, together with costs and disbursements.

Dated: Lake Success, New York
April 1, 2008

Yours, etc.

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BY: _____
Heather L. Smar (4622)